

**UNITED STATES DISTRICT  
COURT NORTHERN DISTRICT OF  
ILLINOIS EASTERN DIVISION**

ANGELICA JUNIOUS,  
Plaintiff,

v.

SGT. W. BAKER, et al.

Defendants.

Case No. 22-cv-3681

Honorable Judge Edmond E. Chang

Magistrate Judge Maria Valdez

**AGREED MOTION FOR ENTRY OF AN AGREED CONFIDENTIALITY ORDER**

NOW COME, Plaintiff, ANGELICA JUNIOUS (“Plaintiff”), by and through her attorneys, CIERRA NORRIS, MELVIN L. BROOKS, and BRIAN M. OROZCO, and Defendants SGT. W. BAKER, C/O C. CHENGARY, LT. PURCELL, COOK COUNTY SHERIFF THOMAS J. DART, and Cook County (“Defendants”) (collectively the “Parties”), by and through their attorney KIMBERLY M. FOXX, through her assistants, ANTONIO LEE and AMANDA C. GUERTLER, and respectfully request this Court to enter a qualified protective order. In support of this Motion, the Parties state as follows:

1. On October 5, 2022, this case was referred to this Court for discovery supervision pursuant to Local Rule 72.1. Dkt. Nos. 25-26.
2. Defendants’ counsel conferred with Plaintiff and discussed entering a Confidentiality Order related to Defendants’ production of documents.
3. Plaintiff has no objection and agrees to entry of a Confidentiality Order.
4. Defendants’ discovery responses include confidential information, as well as potentially personal information of non-party individuals.

5. The proposed Confidentiality Order is based upon the Model Confidentiality Order on the website for the Northern District of Illinois.

6. A copy of the proposed Confidential Order will be sent to [Proposed\\_Order\\_Valdez@ilnd.uscourts.gov](mailto:Proposed_Order_Valdez@ilnd.uscourts.gov).

WHEREFORE, the Parties, respectfully request as follows:

1. The Parties Agreed Motion for Entry of Agreed Confidentiality Order is granted,
2. The Agreed Confidentiality Order is entered, and
3. Any further relief this Court deems appropriate.

Respectfully submitted,

KIMBERLY FOXX  
State's Attorney of Cook County

/s/Antonio Lee  
Antonio Lee  
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### **CERTIFICATE OF SERVICE**

I, Assistant State's Attorney, Antonio Lee, hereby certify that the above and foregoing was served upon Plaintiff's counsel through the CM/ECF filing system on October 25, 2022.

/s/Antonio Lee  
Antonio Lee